

UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF NEW HAMPSHIRE

COALITION FOR OPEN DEMOCRACY,
et al.,

Plaintiffs,

v.

DAVID M. SCANLAN, in his official capacity
as New Hampshire Secretary of State, *et al.*,

Defendants.

Case No. 1:24-cv-00312-SE-TSM

DEFENDANTS' ASSENTED-TO MOTION TO EXTEND DEADLINES

NOW COME Defendants New Hampshire Secretary of State David M. Scanlan and New Hampshire Attorney General John M. Formella (collectively, the “Defendants”), by and through their counsel, the Office of the Attorney General, and move to extend their deadline to file an Objection to Plaintiffs’ Motion to Compel the Statewide Voter Database & Related Documents (ECF No. 60) and to extend Plaintiffs’ deadline to file expert disclosures and written reports (ECF No. 53), and state as follows:

1. On February 27, 2025, Plaintiffs filed their Motion to Compel the Statewide Voter Database & Related Documents. ECF No. 60.
2. Defendants’ Objection is due on or before April 10, 2025. LR 7.1(d).
3. Given the subject matter, relief requested, and importance of the issues that Defendants will raise in their Objection, and also considering undersigned counsel’s caseload, the confluence of several deadlines in other state and federal lawsuits, and competing discovery obligations (in this case and in a similar matter before this Court), Defendants ask for additional time to file their Objection to Plaintiffs’ Motion to Compel.

4. Accordingly, Defendants respectfully request that the Court extend the deadline to file their Objection by 14 days, to April 24, 2025.

5. In consideration of the potential burden that this extension could pose to Plaintiffs' ability to meet their deadline to serve their expert disclosures and written reports by June 4, 2025, Defendants also respectfully request that the Court extend Plaintiffs' time to file their expert disclosures and written reports by 14 days, to June 18, 2025.

6. Local Rule 7.1(a)(2): Due to the nature of the relief requested, no memorandum of law is required.

7. Local Rule 7.1(c): Plaintiffs assent to Defendants' request for an extension to file an Objection to the extent that the Court is also inclined to grant the requested extension to Plaintiffs' deadline for expert disclosures and written reports.

8. Local Rule 7.2(a): Neither this Motion nor its requested relief will result in the continuance of any currently scheduled trial or hearing. Civil Form 3 is attached to this Motion to reflect the requested extension of Plaintiffs' expert disclosure deadline.

Prayer for Relief

WHEREFORE, Secretary of State Scanlan and Attorney General Formella respectfully request that this Honorable Court:

- A. Grant this Assented-To Motion to Extend Deadlines;
- B. Extend Defendants' deadline to object to the Motion to Compel to April 24, 2025;
- C. Extend Plaintiffs' deadline to file expert disclosures and written reports to June 18, 2025; and
- D. Grant such further relief as is just and equitable.

Respectfully submitted,

DEFENDANTS DAVID M. SCANLAN, in his
official capacity as New Hampshire Secretary of
State and JOHN M. FORMELLA, in his official
capacity as New Hampshire Attorney General

By their attorney,

JOHN M. FORMELLA
ATTORNEY GENERAL

Date: April 9, 2025

/s/ Michael P. DeGrandis
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served on all parties of record through
the Court's e-filing system.

/s/ Michael P. DeGrandis
Michael P. DeGrandis